

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STEPHEN KENT JUSICK, ARIES DE LA CRUZ,)
and JUSTIN TAYLOR)

Plaintiffs,)

-against-)

THE CITY OF NEW YORK; MICHAEL)
BLOOMBERG, Mayor of the City of New York;)
RAYMOND KELLY, New York City Police)
Commissioner; STEPHEN HAMMERMAN,)
Former Deputy Commissioner for Legal Matters,)
New York City Police Department; DAVID)
COHEN, Deputy Commissioner for Intelligence,)
New York City Police Department; THOMAS)
DOEPFNER, Assistant Deputy Commissioner for)
Legal Matters, New York City Police Department;)
NYPD LIEUTENANT DANIEL ALBANO; NYPD)
DEPUTY INSPECTOR KERRY SWEET, NYPD)
Legal Bureau Executive Officer; NYPD Legal)
Bureau Senior Counsel RUBY MARIN-JORDAN)
NYPD LEGAL BUREAU SUPERVISOR(S) AT)
PIER 57; JOSEPH ESPOSITO, Chief of the New)
York Police Department; THOMAS GRAHAM,)
Commander, Disorder Control Unit, New York City)
Police Department; JACK MCMANUS, Assistant)
Chief, New York City Police Department; BRUCE)
SMOLKA, former Commander, Patrol Borough)
Manhattan South, New York City Police)
Department; TERENCE MONAHAN, Assistant)
Chief of the Bronx Borough Command; JOHN J.)
COLGAN, Assistant Chief, New York City Police)
Department; JAMES P. O'NEILL, Deputy Chief,)
New York City Police Department; POLICE)
SERGEANT RAYMOND NG, Shield No. 92286;)
POLICE OFFICER ERIC RIVERA, Shield No.)
15811; POLICE OFFICER MARK ALBERTSEN,)
Shield No. 04385; JOHN DOES; RICHARD)
ROES; HUDSON RIVER PARK TRUST,)

Defendants.)

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**STATEMENT OF
RELATEDNESS**

ECF CASE

**JURY TRIAL
DEMANDED**

07 Civ. 7683

Now come the plaintiffs by and through their counsel, JEFFREY A. ROTHMAN, Esq., and make the following statement of relatedness pursuant to Rule 15 of the Rules for the Division of Business Among Judges of the United States District Court for the Southern District of New York.

1. This is a civil rights action in which the plaintiffs seek redress for violation of their constitutional rights suffered by them through the actions of agents of the CITY OF NEW YORK and HUDSON RIVER PARK TRUST during the course of the Republican National Convention (RNC) in late August / early September, 2004.

2. This case raises similar claims concerning the actions of the defendants as those raised in the putative class action *MacNamara v. City of New York, et al.*, 04 Civ. 09216 (KMK), currently pending before Judge Karas and Magistrate Judge Francis, and the numerous other individual actions also pending before Judge Karas and Magistrate Judge Francis stemming from the RNC. These claims include, *inter alia*, claims for 1st Amendment violations, claims for false arrest and related constitutional torts, claims for the conditions of confinement at Pier 57 and 100 Centre Street, and claims for unreasonable length of detention.

4. Permitting this case to be filed as related to *MacNamara* and the other RNC cases currently pending before Judge Karas and Magistrate Judge Francis will promote a substantial savings in judicial resources.

Dated: August 29, 2007
New York, New York

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Attorney for plaintiffs